

1	day?	10:10:30
2	A. My immediate supervisor contacted me and	10:10:31
3	asked me if I could come over.	10:10:34
4	Q. Who was that?	10:10:36
5	A. Josh Sullins.	10:10:36
6	Q. Okay. What did he tell you? Why was he	10:10:38
7	asking you to go over there?	10:10:40
8	A. He just asked if I could come over and clean	10:10:42
9	up the driveway.	10:10:43
10	Q. All right. What about as far as pedestrians	10:10:45
11	who are in the area? If there is a pedestrian in	10:10:52
12	the area, which means someone who's on foot, what	10:10:55
13	does a forklift operator do to make sure that	10:10:57
14	pedestrian is safe during the offloading process?	10:11:00
15	A. Make sure you have eyesight with them.	10:11:02
16	Q. How -- what do you mean by that?	10:11:04
17	A. Get their attention, make sure they're	10:11:06
18	looking at you, and you keep an eye on where they're	10:11:07
19	at.	10:11:09
20	Q. Okay. Do you normally have a conversation	10:11:11
21	with them about, "Hey, I'm going to start offloading	10:11:15
22	right now, so be aware of your surroundings," things	10:11:18
23	like that or what do you mean by --	10:11:19
24	A. Not typically.	10:11:22
25	Q. Okay.	10:11:24

1	A.	Yes. Sometime in the morning.	10:28:43
2	Q.	And then -- so do you go directly over there	10:28:45
3		as soon as Josh asked you to?	10:28:47
4	A.	No. I think it was probably about 30 or 40	10:28:49
5		minutes before I went over there.	10:28:51
6	Q.	All right. What did you have to do? What	10:28:52
7		were you doing in that 30-minute time frame?	10:28:53
8	A.	Going around my jobsite, making sure of what	10:28:56
9		was going on.	10:28:58
10	Q.	Okay.	10:29:00
11	A.	And letting people know that I was leaving.	10:29:00
12	Q.	And you mentioned before that he said he	10:29:03
13		wanted some help cleaning it up. Is that right?	10:29:05
14	A.	Yes.	10:29:08
15	Q.	All right. What did you -- what did you take	10:29:08
16		that to mean? What did he say needed to be cleaned	10:29:10
17		up?	10:29:13
18	A.	Well, they were expecting more deliveries	10:29:14
19		either that day or the next day, and he just wanted	10:29:16
20		the road cleared out so that if anything else came	10:29:19
21		in.	10:29:22
22	Q.	Okay. Do you mean move some of the materials	10:29:23
23		from what had happened here?	10:29:26
24	A.	Yes.	10:29:28
25	Q.	All right. And when you got there, what did	10:29:28

1	take a look at the trailer and the truck where you	11:02:19
2	had moved it over by the trailer office. Is that	11:02:21
3	right?	11:02:25
4	A. Yes, sir.	11:02:25
5	Q. All right. How long were they at the bundle,	11:02:26
6	taking a look at it when you were there? Was it	11:02:27
7	more than, like, say a minute or two?	11:02:31
8	A. No, sir.	11:02:34
9	Q. Just a minute or two?	11:02:34
10	A. Yeah.	11:02:35
11	Q. Okay. Were they taking photographs when they	11:02:36
12	were over there?	11:02:37
13	A. I don't recall seeing them take photographs.	11:02:39
14	They may have gone back and done it later.	11:02:40
15	Q. Sure. And then so they're over there. Then	11:02:42
16	they walk to where the trailer is. And how long are	11:02:46
17	they looking at the trailer while you were there?	11:02:49
18	A. Two or three minutes.	11:02:52
19	Q. And then they went where after that? After	11:02:53
20	they looked at the trailer?	11:02:56
21	A. I want to say they went back towards the	11:02:56
22	bundles.	11:02:59
23	Q. Back to where the bundles were being stored.	11:02:59
24	Is that right?	11:03:02
25	A. Yes.	11:03:03